



\*\*\*Via Email\*\*\*

April 21, 2016

Richard Corey  
Executive Officer  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Subject: Vessel At-Berth Regulation Fleet and Terminal Plans

Dear Mr. Corey,

Under the existing California Air Resources Board (CARB) Vessel At-Berth Regulation, PMSA members are required to submit fleet and terminal plan updates by July 1, 2016. At our last meeting with your staff on January 26, 2016, they shared that they would be proposing consolidating the Equivalent Emission Reduction Option and the Reduced Power Option into a single option. PMSA and our members strongly support this consolidation and are anxious for it to occur. The obvious concern with the pending fleet and terminal plan submittals is they will soon be obsolete resulting in a considerable waste of time and resources.

PMSA requests that the fleet and terminal plan submittals be delayed until these critical issues with the Vessel At-Berth Regulation are resolved. We would respectfully remind you that PMSA, on behalf of our members, has been working proactively with your staff for over two years to amend the Vessel At-Berth Regulation, to avoid these sorts of issues. While we accept CARB's expansion of the regulation, the resulting delays in the much needed amendments to make this regulation workable, should not be allowed to place unnecessary burdens on the regulated community.

PMSA members have gone to extraordinary lengths to comply with the Vessel At-Berth Regulation. Our objective has always been, and remains, to amend this regulation so that compliance can be achieved. Consolidation of the two compliance options is fundamental to that objective. PMSA respectfully requests that CARB delay the terminal and fleet plan

requirements to avoid the waste of time and effort and adds no value to our shared objective to consolidate into a single emission based option.

Sincerely,

A handwritten signature in black ink, appearing to read "T.L. Garrett". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

T.L. Garrett  
Vice President

cc: Cynthia Marvin Elizabeth Yura  
Angela Csondes Jonathan Foster